

Date: _July, 2007_____

Kansas Department of Health and Environment
Economic Impact Statement
Immunization Requirments

Pursuant to the requirements of KSA 77-416, Kansas Department of Health and Environment submits the following economic impact statement.

1. Regulation(s):

(List each regulation number.)

K.A.R. 28-1-20 Immunization requirements

2. Brief description of each regulation(s) and what is intended to be accomplished by adoption.

Establishes minimum vaccinations for children to enter KS schools and minimum vaccinations for children and adolescents in child care facilities, family day care homes, and preschool or daycare programs operated by a school. Intention is to protect children against sometimes fatal diseases easily prevented by licensed, established, available vaccines. The Advisory Committee on Immunization Practices (ACIP) recommends all the proposed and current vaccinations.

3. Is this regulation(s) mandated by federal law as a requirement for participating in or implementing a federally subsidized or assisted program?

Yes ____

No xx ____

If yes, please explain.

4. Do the proposed regulations exceed the requirements of applicable federal law?

Yes ____

No xx ____

If yes, please explain.

5. Description of Costs: Costs are calculated only for those recommended vaccinations that are not currently in the regulation, i.e., daycare settings.

Presumption that 30% of KS children would be in settings to which the new regulation would apply.

Presume KS birth cohort continues at approximately 38,000 per year

Presume costs of full series for the vaccinations:

Vaccine	Total series costs
Haemophilus influenza b	\$ 38.12
Hepatitis A	\$ 24.50
Hepatitis B	\$ 27.90
Pneumococcal disease	\$249.00
Varicella	\$118.30
TOTAL	\$457.82

a. Cost to the agency:

The Vaccines For Children program (VFC) The vaccine for children program is a federal entitlement program that will pay for any ACIP recommended vaccine. Children on Medicaid, Native American children and those with no insurance coverage are VFC eligible. In KS, that is about 48% of our children, or 110,000 of 0-5 year olds.

The 317 program pays for vaccines for children who are under-insured. According to KDHE data, approximately 25,000 additional children 0-5 years old are eligible for that program.

Approximately 135,000 children would qualify for these two programs. All local health departments participate in these programs as well as many clinics, hospitals and private health care providers.

Presume that 50% of the VFC and 317-eligible children attend child care. This is higher than the 40% estimates of all KS children that are enrolled in child care. There would be 67,500 children eligible for hepatitis A, hepatitis B, and varicella vaccines and 20,000 children eligible for Haemophilus influenza b and Pneumococcal disease vaccines likely to enter or currently be enrolled into child care facilities the first year. The smaller number of children eligible for haemophilus and pneumococcal vaccines is due tot the recommended age limits for vaccination.

Our estimates (from 2006 KS surveys and the 2005 National Immunization Survey) of children less than 5 years old who already receive the additional vaccinations that would be required of childcare entry if the proposed regulations are enacted:

Vaccine	Estimated % of children 0-5 currently vaccinated
Haemophilus influenza b	79
Hepatitis A	* (no reliable estimates)
Hepatitis B	82
Pneumococcal disease	48
Varicella	60

Costs for the additional vaccines for those children 0-5 years who are not fully vaccinated and presume would need the full vaccine series for the first year the proposed vaccinations would be in effect:

Vaccine	Total KDHE costs
Haemophilus influenza b	\$ 160,104
Hepatitis A	\$1,240,313*
Hepatitis B	\$ 150,660
Pneumococcal disease	\$2,589,600
Varicella	\$3,186,000
TOTAL	\$7,326,677

* No reliable estimates available for percentage of KS children vaccinated; conservative presumption is that 25% of children have been vaccinated.

Subsequent years would presumably cost 1/8-1/5 the first year costs as additional children enter childcare.

b. Cost to persons who will bear the costs and those who will be affected, (i.e., private citizens and consumers of the products or services) and are subject to the proposed rules and regulations or the enforcement:

Approximately 93,000 children have health care benefits. In KS, insurance should pay for all costs of vaccines that are required by the State, so costs to parents, would be the cost of a co-payment for a visit, typically \$7-10. Since the suggested vaccination schedule recommends several vaccines given at each visit, the total cost to parents of insured children is likely to total \$20 per child (two additional visits that would otherwise not have occurred) for a total cost to Kansas private citizens of \$1,860,000 for the first year the regulations would be in effect.

c. Costs to other governmental agencies or units:

Cost benefit analyses have not been done for all vaccinations, but it is estimated that routine hepatitis A vaccination for children at age 1 year compared to hepatitis A vaccination at the current rate would prevent over 1,000 additional infections in Kansas at an average total savings of \$45,000 per prevented case (*Pediatrics*; 2007; 119; 12-29).

6. Description of any less costly or less intrusive methods that were considered by the agency for the purpose of the rules and regulations and why such methods were rejected in favor of the proposed rules and regulations.

Several vaccinations are already required under current regulation. The only alternative to vaccination is risk of disease, possible hospitalization, and death.

7. Verification of economic impact statement with League of Kansas Municipalities, Kansas Association of Counties and the Kansas Association of School Boards.

The above mentioned regulations were determined as appropriate for consultation as to the economic impact with the League of Kansas Municipalities, Kansas Association of Counties and the Kansas Association of School Boards, pursuant to KSA 77-416.

Yes__xx__

No_____

If yes:

Date Contacted and by what means (i.e., letter, FAX, etc.):

Response and comments received by:

League of Kansas Municipalities:

_____ Kansas Association of Counties:

_____ Kansas Association of School Boards: